

## **ATTACHMENT 2**

### **AFFIDAVIT**

Affiant, Investigator, Gary Lawson, being duly sworn, deposes and states the following:

### **INTRODUCTION**

1. Affiant is presently employed by the United States Department of Justice, Drug Enforcement Administration (DEA), and has been so employed since 1998. Affiant is currently assigned to the Oklahoma City District Office and has been so assigned since 1998. Affiant has received specialized training and has experience in the investigation of drug trafficking and the manufacturing of controlled substances and controlled substance analogues as defined in Title 21, United States Code. Affiant is presently working with members of a task force in the Oklahoma City and Tulsa areas investigating the manufacture, distribution, and sales of synthetic cannabinoids and drug paraphernalia and the laundering of money received as proceeds from those activities.

2. Affiant knows that “herbal incense” products marketed in the United States as being “legal” and providing a marijuana-like high when smoked have become increasingly popular, particularly among teens and young adults. These products consist of plant material that has been laced with substances (synthetic cannabinoids) that mimic 9-tetrahydrocannabinol (THC), the primary psychoactive ingredient in marijuana. These substances have not been approved by the Food and Drug Administration (FDA) for human consumption and there is no regulatory oversight of the manufacturing process.

These substances are typically sold at head shops, gas stations, individually owned convenience stores and over the Internet. These products are labeled as herbal incense, potpourri or air freshener to mask their intended purpose. It is common for these products to bear labeling disclaimers such as “not for human consumption” “DEA compliant” “Lab Certified” “Legal in all 50 states” and “does not contain any banned substances”.

3. Since 2009, DEA has received an increasing number of reports from poison control centers, hospitals, law enforcement and concerned family members regarding these products and the adverse effects which include agitation, anxiety, nausea, vomiting, fast/racing heartbeat, elevated blood pressure, tremors, seizures, hallucinations, paranoid behavior, and non-responsiveness.

### **INVESTIGATION**

4. Affiant has knowledge of the facts contained herein from personal knowledge of this investigation, a review of investigative reports, and information that affiant obtained from DEA, the Internal Revenue Service Criminal Investigations (IRS-CI), Homeland Security Investigations (HSI), the Oklahoma Bureau of Narcotics (OBN), and local law enforcement officers, physicians, chemists and sources of information.

5. In August 2013, your Affiant became involved in an investigation of a chain of retail establishments also known as “head shops” which operated under the name ZIGGYZ. ZIGGYZ retail shops, residences associated with ZIGGYZ retail shops, and a warehouse facility are located in Oklahoma City, with additional shops located in Tulsa, Bethany, Midwest City, Sand Springs, and Broken Arrow at the following addresses:

- a. 4005-4007 North Pennsylvania, Oklahoma City;
- b. 2016 North MacArthur Blvd., Oklahoma City;
- c. 2228 Air Depot, Midwest City;
- d. 1033 South Meridian, Oklahoma City;
- e. 920-924 SW 59<sup>th</sup> Street, Oklahoma City;
- f. 4508 South May, Oklahoma City;
- g. 6560 East 41<sup>st</sup> Street, Tulsa;
- h. 2122 South Memorial Drive, Tulsa;
- i. 5087 East 51<sup>st</sup> Street, Tulsa;
- j. 2160 West Albany Street, Broken Arrow;
- k. 430 West Wekiwa, Ste. G, Sand Springs;
- l. 4735 South Memorial Drive, Tulsa;
- m. 8201 Glade Avenue, Oklahoma City;
- n. 3465 Brush Creek Road, Oklahoma City;
- o. 10405 Bishops Gate, Oklahoma City;
- p. 14712 Hollyhock Drive, Oklahoma City; and
- q. 1318 North Drexel Boulevard, Oklahoma City.

6. In August of 2013, ZIGGYZ was advertised on the internet as [www.ziggyzsmokeshop.com](http://www.ziggyzsmokeshop.com) but is now listed as suspended. In December 2014, a second ZIGGYZ internet address was identified as [www.ziggyzstore.com](http://www.ziggyzstore.com) and appears to be active. ZIGGYZ became registered with the Oklahoma Secretary of State on May 29, 2008, as ZIGGYZ Gift Shop. Surveillance, undercover buys, bank account information

and recent search warrants and employee interviews has shown that the primary business of ZIGGYZ is selling drug paraphernalia and “herbal incense.” ZIGGYZ is owned and operated by Xiang Yu REN, aka: Johnny REN and his sister, Wei Yu REN, aka: Wendy REN.

7. On April 16, 2015, the Court found probable cause to believe that from January 2011 and continuing through April 22, 2015, Xiang Yu REN and Wei Yu REN, and others not named herein, doing business as ZIGGYZ, have committed, the crimes of selling and offering for sale schedule I controlled substances, controlled substance analogues and drug paraphernalia in violation of Title 21 U.S.C §§ 802(32), 813, 841(a)(1), and 863(a) as well as money laundering in violation of Title 18 U.S.C. §1956 (a)(1)(A)(i), §1956 (A)(1)(B)(i), and §1957.

### **BACKGROUND**

8. On June 16, 2011, the DEA Oklahoma City District Office received information from the Tinker Air Force Office of Special Investigations (OSI) regarding the use of synthetic cannabinoids by enlisted personnel and their subsequent discharge. OSI agents specifically identified ZIGGYZ as a supplier of synthetic cannabinoids.

9. On July 16, 2012, the Bethany Police Department (BPD) received information from a synthetic cannabinoid user that the ZIGGYZ at 2016 N. MacArthur, Oklahoma City, Oklahoma was selling “K2,” a street term for synthetic cannabinoids. Since that day, Bethany Police have reported numerous encounters involving synthetic cannabinoids that originated from one or more ZIGGYZ locations.

10. On June 4, 2013, affiant along with other investigators interviewed a Source of Information (SOI) who was an associate of ZIGGYZ store manager, William Antonio CHAUNCEY known to the SOI as "Tony" aka: Phat Bastard. The SOI said Tony works mainly out of the ZIGGYZ store at 4508 S. May Ave, Oklahoma City, Oklahoma, but is known to travel around to all the other ZIGGYZ stores.

11. The SOI advised he met Tony about a year and a half before (late 2011 or early 2012) when a convenience store owner ran out of incense and told him to go see Tony at ZIGGYZ. The SOI advised he has bought (incense/spice) from him ever since. The SOI advised Tony only sells "the good stuff" that contains "JWH" and sells the JWH product in 3 grams packets with labels such as "Scooby Snax," I-Blown" and "Dream" for \$25 to \$27 per packet or roughly \$8 to \$9 per gram. Your affiant knows that a similar quantity of incense sold at a local Wal-Mart sells for the equivalent of 12.8 cents per gram and that the difference in price in part is due to the fact that there is an expectation on the part of seller and buyer of the JWH product or similar synthetic cannabinoid that it will be consumed in order to achieve a physical "high" or state of euphoria.

12. During that same conversation when asked who Tony buys the packets from, the SOI said he doesn't buy them, he makes them using his own chemicals purchased in New Mexico, possibly Albuquerque. The SOI said he was told by Tony that he makes \$12,000 to \$15,000 per day selling incense. When asked how much incense customers buy each day, the SOI said "hundreds per store, it a traffic jam" and he said it was so busy that Tony has people standing outside the stores selling it. The SOI advised it is

cash only for the incense and that Tony will put the cash in his pockets after the register is full.

13. The SOI advised he mainly purchased his incense at the ZIGGYZ store at 4508 S. May, Oklahoma City, but had also bought at the ZIGGYZ stores at 920 SW 59<sup>th</sup> Street and 4005 N. Pennsylvania, Oklahoma City. The SOI said Tony also uses spice and that they have driven around smoking it in Tony's Toyota FJ Cruiser going from party to party. The SOI explained the incense is the most addictive drug he's ever used and stated he has kicked methamphetamine and heroin habits but can't overcome the spice cravings and said he has lost everything, including his truck because of his addiction to spice.

14. On March 20, 2014, Bethany Police Officers responded to a 911 report of an intoxicated female in the park at 35<sup>th</sup> and Mueller. Upon arrival officers identified the intoxicated female and learned she was playing with kids in the park that were not hers and cursing at people in the park. When officers approached the female, identified as Angelia Diamond, they observed her drinking from a vodka bottle and having a hard time sitting on a bench without falling off. After refusing instructions by the officers, Diamond was arrested for disorderly conduct at which time she began yelling and cursing. Officers found Diamond in possession of the vodka, Zig Zag rolling papers and an open package of "24k Monkey" synthetic cannabinoids. When asked, Diamond admitted to smoking the synthetic cannabinoids which she purchased from the ZIGGYZ store at 924 SW 59<sup>th</sup> Street, Oklahoma City. After being placed in the patrol vehicle, Diamond became combative and attempted to kick out the rear window at which time she was removed and placed in a vehicle with safety bars. When approaching the jail,

Diamond threatened to bite officers. After refusing to step out, Diamond had to be physically removed from the vehicle. Upon entering the jail, Diamond became combative, spun and attempted to bite an officer. Diamond's violent behavior continued while at the jail even with medical personnel rendering aid she still attempted to spit blood on arriving firemen.

15. On January 2, 2014, OBN Agent Richard Paulk interviewed Emergency Room Physician, Dr. Michael Allswede about his experience with synthetic cannabinoids while employed with Integris Southwest Medical Center, Oklahoma City, Oklahoma. Allswede said he noticed a spike in the number of overdose cases approximately two years earlier (2012). Dr. Allswede said he treats on average, one synthetic related overdose per shift. Dr. Allswede listed the most common symptoms associated with the overdoses as tachycardia (rapid heartbeat), hallucinations, belligerent behavior, anxiety and seizures. Treatments, according to Dr. Allswede will vary for each patient depending on the symptoms produced, from observation to sedation, to anti-seizure medication.

16. On February 12, 2015, after learning of multiple synthetic cannabinoid overdoses, affiant traveled to the Emergency Room at St. Anthony Hospital, 1000 N. Lee Ave, Oklahoma City, Oklahoma and spoke with Charge Nurse, Hilary Plagg, RN. When asked about the synthetic problem, Nurse Plagg said it's terrible and seems to be getting worse. Plagg explained it has been so bad in the last two weeks ER staff started keeping an unofficial "K2" overdose count. Plagg reviewed her paperwork and said the count was up to 32 (patients) since February 2, 2015. Plagg stated that on Thursday, February 5, 2015, they received seven K2 overdoses which took five EMS units to transport. Plagg

advised patient age has varied with a 16 year old as the youngest and 62 being the oldest. Plagg estimated the average patient age was between 20 and 30. Plagg and other ER staff standing by Plagg agreed the problem is getting much worse not only by the number of patients but by how violent they are becoming. Plagg said most have to be restrained. Plagg and a few other nurses described the patients as catatonic and hallucinating.

**Undercover Purchases, Surveillance Activity, and Seizure**

17. On July 24, 2012, Bethany Oklahoma Police Department (BPD) conducted an undercover purchase of "herbal incense" from the ZIGGYZ shop located at 2016 N. MacArthur, Oklahoma City, Oklahoma. The BPD detective purchased a 1.5 gram package of "Good Scents" for \$16.26. A lab analysis confirmed the chemical presence of UR-144 and XLR11. Both of these substances were identified as controlled substance analogues. A controlled substance analogue means a substance for which the chemical structure is substantially similar to the chemical structure of a controlled substance in Schedule I or II and which has a similar effect on the central nervous system or for which a person represents that the substance has a similar effect on the central nervous system.

18. On August 16, 2013, Oklahoma Bureau of Narcotics (OBN) conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, OK. An OBN Agent and Confidential Informant (CI) together purchased a total of six packages of synthetic cannabinoids and a package of rolling papers for \$58.70. This sale indicated that the store clerk knew the customer intended to consume the six packages of synthetic cannabinoid. The agent and the CI entered the ZIGGYZ store and observed an assortment of pipes, bongs and other



smoking paraphernalia displayed in glass counters along with synthetic cannabinoids in a variety of packages. The noted packages were labeled "Tranquility," "iBlown" (mirroring iPhone) and "Southern Max" which came in several flavors (Cotton Candy, Strawberry, Blueberry, etc.). The agent spoke with a female clerk behind the counter about the different types of synthetic cannabinoids. The clerk explained that certain types are more popular than others. The agent asked if she preferred one over the other. The clerk stated there was one rule to follow if she was going to work there (ZIGGYZ) and that is "she could not do any of these." The clerk then stated she "can do the real thing, funny huh?" When the agent asked about rolling papers, the clerk gave him the price and told him to go speak to the other female clerk at the end of the counter in order to check out and get everything. After checking out and upon exiting, an unknown white male approached the agent and gave him a card and stated since he had "spice" (slang word for synthetic cannabinoids), he has a friend that had started up an aroma therapy store of his own. The address for the store of which the white male was speaking was on the card. The agent and the CI then departed the ZIGGYZ location. A lab analysis confirmed the chemical presence of AB-FUBINACA in the sample packages analyzed. At that time, AB-FUBINACA was a synthetic cannabinoid that had pharmacological effects similar to the Schedule I hallucinogen THC.

19. On September 3, 2013, an OBN agent and CI conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2016 N. MacArthur Blvd., Oklahoma City, Oklahoma. The agent and CI together purchased a total of five packages of synthetic cannabinoids, a package of "Zig-Zag" rolling papers and a smoking pipe for

\$70.89 from the clerk. This sale clearly indicated that the substance was intended for human consumption. The packages were labeled "B2 DA Bomb," "Laughing Buddha" and "Street Legal." Upon entering the store, the agent and CI observed plastic bins packed full of various kinds of synthetic cannabinoid packets located on the floor behind the glass display counters. Inside the glass cases, an assortment of pipes, wrapping papers and other smoking paraphernalia was observed. Also on display was a variety of synthetic cannabinoid packages varied gram amounts and bearing product names such as "Tranquility," "Roses," "Laughing Buddha," "B2 Da Bomb" and "Southern Max." While in the store, the CI spoke with a young white female clerk with dyed hair working behind the counter. When asking about the various synthetics available the clerk stated the "White Rabbit" was a "natural pain killer" and that "they are illegal in China" and "they do the job real good." She further stated they were fifty dollars for ten. This conversation clearly indicates that the clerk knew the sale of the substances was intended for human consumption. During the conversation between the CI and clerk, and with other customers, the clerk stated that there are other related ZIGGYZ stores in Las Vegas. When asked about an older woman that works at the store nicknamed "Grandma," the clerk stated "she is in Vegas, closing down the Las Vegas stores since they don't make nothing." As the clerk turned her attention toward the agent, he asked her about the "B2 Da Bomb Chronic." She stated, "It's good." The agent then asked her about the "Roses" to which the clerk replied some people have come back several times for it and explained it is made by the same people that make "Da Bomb" and "Street Legal" and that those are good. At the conclusion of the purchase, the agent asked the clerk which of the two she

preferred. The clerk stated, "My boyfriend prefers that one" (pointing to the larger package) and said "I don't do it, he's my reference, he's a felon." A lab analysis confirmed the chemical presence of AB-FUBINACA in one of the sample packages analyzed. Again, AB-FUBINACA at the time was a synthetic cannabinoid that had pharmacological effects similar to the Schedule I hallucinogen THC.

20. On September 11, 2013, an OBN agent and CI conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 S. Meridian Ave, Oklahoma City, Oklahoma. The agent and CI together purchased a total of two packages of synthetic cannabinoids, a package of "Zig-Zag" rolling papers and a smoking pipe for \$53.35. This sale clearly indicated to the clerk that the substance was intended by the purchaser for human consumption. The packages were labeled "B2 DA Bomb" and "iBlown." The agent and the CI entered the store and observed plastic bins packed full of various kinds of synthetic cannabinoid packets and glass bongs, glass and wooden pipes, and other smoking paraphernalia were present either in the glass case or on shelves. The agent noted that unlike other stores previously visited, there were not a variety of packages that contained synthetics out for display. Instead there was a list of available packages and the prices listed for each taped to the glass counter. Additionally, there were multiple signs that stated, "Please be sure to use proper terminology when asking for products." Your affiant believes that these signs were posted for the benefit of owner and employees who sought to sell their products in such a way as to avoid scrutiny by law enforcement or otherwise law abiding patrons.

21. On September 26, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4508 S. May Ave, Oklahoma City, Oklahoma. The DEA Task Force Officer (TFO) purchased six packages of synthetic cannabinoids and a smoking pipe for \$97.00. This sale indicated to the clerk that the substance was intended for human consumption by the purchaser. The TFO observed the clerk place the funds into the store's cash register. The packages were labeled "Scooby Snax Blueberry Bliss," "Scooby Snax Green Apple" and "Blue Dream Potpourri Original." A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in all six packages.

22. On September 26, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 924 SW 59<sup>th</sup> Street, Oklahoma City, Oklahoma. The DEA TFO purchased 10 packages of synthetic cannabinoids and a metal smoking pipe for \$173.00. This sale clearly indicated that the substance was intended for human consumption. The TFO observed the clerk place the funds into the store's cash register. The packages were labeled "Scooby Snax Hypnotic," "Scooby Snax Hydro," "Blue Dream Potpourri Strawberry," "Blue Dream Potpourri Original," "B2 DA Bomb Jungle Juice" and "Watermelon Iblown." A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in nine of the ten packages.

23. On September 26, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2228 S. Air Depot, Midwest City, Oklahoma. The DEA Task Force Officer (TFO) purchased 19 packages of synthetic cannabinoids

and two glass smoking pipes for \$250.00. This sale indicated to the clerk that the substances were intended for human consumption by the customer. The TFO observed the clerk place the funds into the store's cash register. The packages were labeled "Southern Max II Grape," "Southern Max II Pineapple," Southern Max II Cotton Candy," "Watermelon," "Blue Dream Potpourri Strawberry," "Laughing Buddha Strawberry," "Scooby Snax Potpourri Hypnotic," "Scooby Snax Potpourri Apple Green," "Scooby Snax Potpourri Original," "Cloud 9 Mad Hatter Incense" and "Bizarro." The DEA TFO told the clerk he wanted the good stuff and that it was for a bachelor party. The clerk told the TFO she would not charge sales tax so he would be able to buy more. A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in all 19 packages.

24. On October 3, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, Oklahoma. The agent purchased two packages of synthetic cannabinoids and a metal smoking device known as a "one hitter" for \$38.00. This sale indicated to the sales clerk that the substances were intended for human consumption by the customer. The packages were labeled "Mad Hatter" and "Blue Dream." A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in the sample packages analyzed.

25. On October 3, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2016 N. MacArthur Blvd, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoids and a wooden

smoking pipe for \$37.92. This sale clearly indicated to the clerk that the substances were intended for human consumption by the customer. The packages were labeled "Laughing Buddha" in mango, grape and strawberry flavors. Once in the store the agent observed two employees, two white males, one with blonde hair, one with brown hair and a white female with purple dyed hair. The agent noted the store was set up so that customers were able to observe multiple packages of synthetic cannabinoids in a variety of names and weights within the glass counter. Each package ranged in price from approximately ten dollars to approximately thirty dollars. Additionally, the agent noted glass and wooden pipes were present on multiple shelves within the glass counter and glass bongs lined the walls and on hung shelves. During the time the agent was in the store he conversed with one of the clerks regarding his intended use of the synthetic cannabinoids. The agent asked the blonde haired clerk about the "Bizarro" brand of synthetic cannabinoids, if it was grape. The clerk stated he didn't know and said he didn't think it had a scent. The agent stated he had the "Mad Hatter," but found it too harsh and said he wanted something more mellow. The clerk pointed to the "Laughing Buddha." The agent asked, "The Buddha is pretty mellow?" The clerk replied, "Yah." The agent asked the clerk about the "Blue Dream." The clerk stated "Blue Dream is going to be like the Southern Max. It's going to be kind of strong." The agent then brought up the "Roses" brand to which the clerk stated, "It's not that good. A lot of people don't like it." The clerk said, "I'm not saying it does nothing, but for a lot of people, it doesn't last very long." The agent decided on "Laughing Buddha" and purchased three packages, one mango, one strawberry and one grape. As the clerk pulled the packages out of the plastic

bins lined up on the floor behind the counter, the agent pointed to the wooden pipes for sale and stated, "Last time I was in, there was a basket. They were a little bit smaller, but they were like three or four dollars." The clerk replied, "The little wooden ones right? I think we're out of those." The agent told him he would take one of the larger wooden pipes to go with the packages of "Laughing Buddha." The agent walked over towards the cash register and stated, "Like I said, this is more mellow, but I'm still gonna..." The clerk interrupted and said, "Yeah." The agent continued, "If I don't feel anything I'm going to be back." The clerk smiled and nodded to the affirmative and said these were going to be mellow where the southern max would be strong. The agent replied, "as long as I can feel something, that's all I really care about." The clerk again nodded to the affirmative, and then sold the agent three packages of "Laughing Buddha" and a wooden pipe and placed them in a small paper bag. This conversation clearly indicated to the clerk that the substances purchased were intended for human consumption. A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in the sample packages analyzed.

26. On October 3, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 S. Meridian Ave, Oklahoma City, Oklahoma. The agent purchased a package of synthetic cannabinoid and a pack of "Juicy Jay" rolling papers for \$32.51. This sale indicated to the clerk that the substance sold was intended for human consumption by the customer. The package of synthetic cannabinoid was labeled "Bizarro." While in the store the agent had a conversation with the clerk regarding his intended use of the synthetic product. The agent asked the clerk if



there were any specials to which she replied they had just taken down all their specials. The agent asked her, "What's the Bizarro like?" The clerk stated that some people like it and some don't. The agent asked, "Too harsh?" She replied, "Some people say it's not strong enough and some people say it's just right." The agent then asked, "So it's one of the more mellow ones?" She replied, "It's not like weak, weak, but not like knock you on your ass, either." The agent stated he had some stuff that was too harsh. The clerk replied, "I hear you." Then a second clerk, a black male stated, "Yeah, that Mad Hatter..." The agent stated, "Yeah, the Mad Hatter fucked me up a little bit." The female clerk replied, "Oh, really?" The agent then asked if the "Bizarro" would be a little bit better. The female clerk stated if "I was looking for something that wasn't going to kill ya," she would go with it. The agent told her that he would buy the Bizarro and wanted to get some papers with it. The agent paid for the Bizarro and the rolling papers and asked the female clerk when new shipments would be available to which she replied, "It's kind of hit and miss. My brother works at the warehouse. Will either be tomorrow or next week." This conversation clearly indicated that the store employee knew the substance sold was intended for human consumption. A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in the sample package analyzed.

27. On November 6, 2013, at approximately 4:50pm, agents established surveillance at the ZIGGYZ warehouse, 8201 N. Glade Avenue, Oklahoma City, OK. Agents observe "Johnny" (Xiang REN) depart the warehouse in a black BMW SUV bearing Oklahoma tag number 888-AGI. Agents then observed an unknown white male loading boxes from



the ZIGGYZ warehouse into a white Volkswagen for an unknown white female. The unknown female departed the warehouse in the Volkswagen and was observed driving erratically at which time she was stopped by Bethany Police. The officer identified the driver as Deborah Ann PASTORFIELD who told the officer she was making a delivery for her work and when asked PASTORFIELD said she worked for ZIGGYZ. While speaking with PASTORFIELD, the officer observed a glass smoking pipe and an open pack of synthetic "marijuana" labeled "I BLOWN" in the car. PASTORFIELD stated she took it from one of her customers because they were smoking it. When told it was illegal, PASTORFIELD said she knew and surrendered it to the officer. PASTORFIELD was given a written warning for her expired tag and was released. Agents observed PASTORFIELD as she delivered the boxes in her vehicle to the ZIGGYZ at 4508 South May Avenue, Oklahoma City, Oklahoma. The pipe and synthetic were booked into evidence. The synthetic was later submitted to the OSBI Laboratory for testing. A lab analysis confirmed the chemical presence of XLR-11 and PB-22 in the surrendered package. XLR-11 was and is a Schedule I controlled substance. PB-22 was and is a controlled substance analogue.

28. On November 13, 2013, at approximately 7:42am, DEA established surveillance at 10405 Bishops Gate, Oklahoma City, Oklahoma. Affiant knows that this is the residence of "Wendy" Ren and that the residence is owned by Apple Tree Enterprises which is in turn owned by "Johnny" Ren. Affiant also knows that "Wendy" Ren is the younger sister of "Johnny" Ren. Affiant observed three vehicles parked at the residence which are registered to or associated with the ZIGGYZ organization. A 2011 green Jeep

bearing OK tag 168-HZS registered to Wei Yu Ren and a silver Toyota Tundra truck bearing tag 229-JLN were parked in the driveway and an older 80's model dark green GMC pickup (tag later identified as 411-KOU, registered to a ZIGGYZ employee, Ronald ARTHUR at the ZIGGYZ warehouse (8201 Glade Ave, Oklahoma City, OK) parked on the street in front of the home. Affiant observed a younger white male in his mid-20's exit the residence with several white plastic bags who loaded said bags into the truck cab and then departed the residence. The green Jeep then departed the residence. At approximately 10:42 am, Affiant observed "Johnny" REN exit the residence and depart in a silver Toyota Tundra truck bearing OK tag number 229-JLN. From the residence, "Johnny" REN traveled to the drive thru lane at the First Fidelity Bank, 12215 N. MacArthur Blvd, Oklahoma City, Oklahoma. "Johnny" REN then departed the bank and traveled to the ZIGGYZ warehouse located at 8201 Glade Ave, Oklahoma City, Oklahoma. At approximately 8:39am, DEA personnel observed a **2011 green Jeep, displaying Oklahoma license 168-HZS**, parked in front of the ZIGGYZ, located at 4005 North Pennsylvania, Oklahoma City, Oklahoma. Investigators then observed "Wendy" REN and an unidentified male (later identified as Calvin O'DAY) enter the Jeep and drive across the street then return to ZIGGYZ and walk back inside the store.

29. At approximately 8:51am, Investigators observed REN and O'DAY exit ZIGGYZ and put numerous white bags in the rear of the **green Jeep** then return inside ZIGGYZ.

30. At approximately 10:00am, Investigators observed REN, O'DAY and a female (later identified as Alanna HANSON) enter the Jeep and drive to the convenient store across the street and then depart the store in the Jeep. Investigators observed the jeep

leave Oklahoma City and drive to a ZIGGYZ located at 5087 East 51st Street, Tulsa, Oklahoma. Investigators observed O'DAY retrieve two white bags from the rear of the Jeep and take them inside ZIGGYZ. Additional white bags were left in the rear of the Jeep. At approximately 12:26pm, Investigators observed the Jeep leave the ZIGGYZ location.

31. At approximately 12:33pm, Tulsa Police Department (TPD) conducted a traffic stop of the **Jeep** as it was turning into the entrance for ZIGGYZ at 4628 East 31st Street, Tulsa, Oklahoma. Based on an improper lane change the Jeep was stopped as it was making a left turn into the ZIGGYZ parking lot. During the traffic stop, all occupants of the vehicle were identified, O'DAY as the driver, "Wendy" REN as the front passenger, and HANSON as the rear passenger. O'DAY told the officer he worked for "Wendy" REN and drove her to (ZIGGYZ) stores as she makes deliveries. The officer obtained gained consent to look into the Jeep and observed several trash bags filled with what "Wendy" REN referred to as "potpourri." "Wendy" REN permitted the officer to look at the "potpourri" and he observed the trash bags were filled with packages of "Sex Monkey." "Wendy" REN told the officer she sells the packages for \$5 to \$10 dollars each. The officer asked "Wendy" REN how much she would sell him one of the packages for at which time "Wendy" REN gave him a package. The officer took possession of the package of "Sex Monkey," cited O'DAY for Driving under Suspension and finished his traffic stop. A lab analysis confirmed the chemical presence of XLR-11 in the surrendered package. XLR-11 was and is a Schedule I controlled substance.

32. On November 14, 2013, DEA attempted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4628 East 31<sup>st</sup> Street,<sup>1</sup> Tulsa, Oklahoma. The DEA TFO attempted to purchase synthetic cannabinoids using the product name “Dream” and “Sexy Monkey.” The TFO was told by the clerk the potpourri was not here anymore and that they don’t sell it because it’s illegal now. The clerks then directed the TFO to the ZIGGYZ located at 5087 East 51<sup>st</sup> Street (Tulsa) area to purchase the illegal substances.

33. On November 14, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 5087 East 51<sup>st</sup> Street, Tulsa, Oklahoma. The DEA TFO purchased 5 packages of synthetic cannabinoids, a glass smoking pipe and two packs of pipe screens for \$100.00. This sale indicated to the TFO that the employee knew that the substances sold were intended for human consumption. The packages were labeled “Mad Monkey,” “AK-47 Grape Ape,” “Sexy Monkey,” “Bizarro” and Scooby Snax.” The clerk told the TFO that he would deal in cash so he didn’t have to add “Uncle Sam’s” part in, referring to sales tax. The TFO told the clerk he did not want blueberry flavor because his girl said it tasted like shit to which the clerk laughed. The TFO observed the clerk place the \$100.00 into the store register. A lab analysis confirmed the chemical presence of AB-FUBINACA in 2 packages and XLR-11 in 1 package. AB-FUBINACA was a controlled substance analogue at the time of sale and XLR-11 was officially a Schedule I controlled substance.

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<sup>1</sup> This store is currently closed and appears to be empty.

34. On November 14, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 6560 East 41<sup>st</sup> Street, Tulsa, Oklahoma. The DEA TFO purchased 5 packages of synthetic cannabinoids, a glass smoking pipe and one pack of pipe screens for \$94.41 with no receipt. This sale indicated that the clerk knew the substances were intended for human consumption by the customer. The packages were labeled "Iblown," "Laughing Budda" and "Sexy Monkey." The TFO told the clerk he did not want any blueberry because it tasted bad. After the sale was finalized, the TFO observed the clerk write on a log that was attached to a clip board next to the register. A lab analysis confirmed the chemical presence of AB-FUBINACA in one package and XLR-11 in another package. AB-FUBINACA was a controlled substance analogue at the time of sale and XLR-11 was officially a Schedule I controlled substance.

35. On November 14, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2122 South Memorial Road, Tulsa, Oklahoma. The DEA TFO purchased 7 packages of synthetic cannabinoids, a glass smoking pipe and pipe screens for \$103.96 with no receipt. This sale indicated to the DEA TFO that the substances sold were intended for human consumption. The clerk explained she couldn't bag the items together and bagged the pipe and screens separate from the synthetic cannabinoids. Affiant believes this new method of packaging product in the Tulsa area stores was a veiled attempt by store owners to separate the use of the drug paraphernalia sold from the product being sold. The packages were labeled "I Phone Watermelon" and "Laughing Buddha Mango." A lab analysis confirmed the

chemical presence of AB-FUBINACA, a controlled substance analogue, and XLR-11, a Schedule I controlled substance.

36. On November 14, 2013, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2160 West Albany Street, Broken Arrow, Oklahoma. The DEA TFO purchased 23 packages of synthetic cannabinoids for \$201.00 with no receipt. The clerk provided the TFO with 2 glass smoking pipes and pipe screens at no charge. This sale clearly indicates that the clerk knew the product sold was intended for human consumption by the customer. When asked, the clerk provided the TFO with his cell phone number. When placing the items into a bag the clerk said he couldn't put the pipes into the bags with the synthetic cannabinoids. Your affiant believes this new method of packaging product was a veiled attempt by store owners to separate the use of the drug paraphernalia from the product being sold. The packages were labeled "Laughing Buddha Mango," Southern MaxII Grape" and Southern MaxII Cotton Candy." A lab analysis confirmed the chemical presence of AB-FUBINACA, a controlled substance analogue, in the sample packages analyzed.

37. On December 4, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoids, a metal smoking device known as a "one hitter" and a package of rolling papers for \$55.42. This sale indicated to the OBN agent that the substances purchased were intended for human consumption by the store employee. The packages were labeled "Mad Monkey," "Sexy Monkey" and "Crazy Monkey." A lab analysis confirmed

the chemical presence of XLR-11 in the sample packages analyzed. XLR-11 at the time was officially a Schedule I controlled substance.

38. On December 4, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2016 N. MacArthur Blvd, Oklahoma City, Oklahoma. After a conversation with the clerk about using the synthetic cannabinoids, the agent purchased three packages of synthetic cannabinoids and a metal smoking pipe for \$54.19. The packages were labeled “AK-47 Cherry Popper,” “AK-47 Gold” and “AK-47 Grape.” A lab analysis confirmed the chemical presence of XLR-11 in the sample packages analyzed. XLR-11 at the time was a Schedule I controlled substance.

39. On December 4, 2013, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 S. Meridian Ave, Oklahoma City, OK. The agent purchased three packages of synthetic cannabinoid and a glass “one hitter” smoking pipe for \$59.60. The packages of synthetic cannabinoids were labeled “Mad Hatter.” A lab analysis confirmed the chemical presence of XLR-11 in the sample packages analyzed. XLR-11 at that time was a Schedule I controlled substance.

40. On February 5, 2014, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 South Meridian Ave, Oklahoma City, Oklahoma. The DEA TFO purchased 4 packages of synthetic cannabinoids and a glass smoking pipe for \$100.00. The TFO engaged the clerk in a conversation about the different types of synthetic cannabinoids for sale and that he wanted to get his girl in the mood. The clerk described the synthetic cannabinoid products as an “uplifting aroma

therapy experience” and then described one of the products as “legal Percocet” and said “in small doses it works like a stimulant, in larger doses it works like a Percocet, so it’s kind of fun.” When discussing the synthetic cannabinoids, the clerk said, “it works just like an opiate in your body” and further stated, “it’s cool, a lot of people are using it get off of methadone and Suboxone and heroin, and stuff like that.” This conversation clearly indicated to the TFO that the substances being sold were clearly intended for human consumption by the store employee. The packages purchased by the TFO were labeled “Mad Monkey,” “Jack & Jill Sexy Monkey” and “Sexy Monkey.” A lab analysis confirmed the chemical presence of XLR-11 and PB-22 in the sample packages analyzed. At the time of the sale, XLR-11 was a Schedule I controlled substance and PB-22<sup>2</sup> at the time was a controlled substance analogue.

41. On February 5, 2014, DEA conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4508 South May Ave, Oklahoma City, Oklahoma. The DEA TFO purchased 13 packages of synthetic cannabinoids and a smoking pipe for \$100.00. The TFO entered into a conversation with “Tony” (identified as William Antonio CHAUNCEY) about the synthetic cannabinoid products and why it was not displayed and you now had to ask for it. Tony said, “we got a keep my shit behind [counter] in case something happens.” Tony described the “Bling, Bling” product as the biggest seller and discussed pricing in gram amounts. The packages were labeled “Mad Monkey” and “Bling Bling Monkey.” A lab analysis confirmed the chemical presence of XLR-11. XLR-11 was and is a Schedule I controlled substance. After the

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<sup>2</sup> On February 10, 2014, PB-22 was officially listed federally as a Schedule I controlled substance.



above purchase, the TFO and CHAUNCEY walk out of the shop to a **2012 Toyota FJ Cruiser**, a vehicle driven by CHAUNCEY. CHAUNCEY and the TFO had a discussion about the vehicle's accessories at which time CHAUNCEY open up the front and rear of the Toyota FJ Cruiser in order to show the TFO the audio equipment. The TFO then departed the location. **A check of the 2012 Toyota FJ Cruiser listed Xiang REN as the vehicle's registered owner.**

42. On March 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoids and a metal smoking device known as a "one hitter" for \$32.61 using a pre-paid Visa credit card. The packages were labeled "Dead Man Walking," "Devil's Eye" and "Mind Trip." A lab analysis confirmed the chemical presence of XLR-11 in the sample packages analyzed. XLR-11 was and is a Schedule I controlled substance.

43. On March 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2016 N. MacArthur Blvd, Oklahoma City, Oklahoma. The agent purchased a package of synthetic cannabinoids and a smoking pipe for \$28.28 using a pre-paid Visa card. The package was labeled "Bling Bling Monkey." A lab analysis confirmed the chemical presence of THJ-2201 in the analyzed package. Your affiant knows that THJ-2201 has a chemical structure substantially similar to the Schedule I controlled substance AM2201 and that AM2201 is a synthetic cannabinoid with effects similar to marijuana. Furthermore, your affiant knows that THJ-2201 has

hallucinogenic effects on the central nervous system that are substantially similar to the Schedule I substance, AM2201.

44. On March 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 S. Meridian Ave, Oklahoma City, Oklahoma. The agent purchased a package of synthetic cannabinoid and two glass smoking pipes for \$27.09 using a pre-paid Visa card. The package of synthetic cannabinoid was labeled "Bling Bling Monkey." A lab analysis confirmed the chemical presence of AB-PINACA in the analyzed package. AB-PINACA is a controlled substance analogue that is chemically similar to AB-FUBINACA, and has a similar effect on the central nervous system.

45. On August 6, 2014, at approximately 11:30pm, officers from the Broken Arrow Police Department responded to a burglary alarm call at the ZIGGYZ, located at 2160 W. Albany Street, Broken Arrow, Oklahoma. Upon arrival officers found the front door glass shattered. When searching for the suspect inside the store, officers discovered a large quantity of contraband. Officers then obtained a search warrant for the ZIGGYZ store. Officers seized approximately 13,817 packets of synthetic cannabinoids bearing product names such as Crazy Monkey, Sexy Monkey, Mad Monkey, 7H, Laughing Budda, I blown, Purple Diesel, 24K Monkey, Bling Bling, Thirsty Skull, Devil Eye, What's Up, Green Giant, Mega Zombie, Mad Hatter, 7H Hydro, Green Buddha, King Kong, LV Premium, Mister Nice Guy, I'm On One, Golden Leaf, Diablo, Super Nova, Bloody Zombie, Sexy Zombie, Pure Fire, Hydro, Southern Max, Bloody Eyes, Blue Dream, Platinum, Klimax By Kush, Pure Evil, Satan, Most Dope, and Devil's Inferno.

An OSBI lab analysis confirmed the chemical presence of XLR-11; AB-FUBINACA; UR-144; and AB-PINACA in the analyzed packages. The Oklahoma Tax Commission permit seized from the store listed a mailing address of New Century Enterprises, Inc, 3465 Brush Creek Rd, Oklahoma City, OK 73120.<sup>3</sup> XLR-11 was and is a Schedule I controlled substance. AB-FUBINACA, UR-144, and AB-PINACA are controlled substances analogues.

46. On August 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoids and a pack of rolling papers for \$30.45. The sale indicated that the clerk knew the product was intended for human consumption by the customer. The packages were labeled "Satan." A lab analysis confirmed the chemical presence of XLR-11 in the sample packages analyzed. XLR-11 was and is a federal controlled Schedule I substance.

47. On August 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 2016 N. MacArthur Blvd, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoids and a pack of "juicy" milk chocolate rolling papers for \$29.91 using a pre-paid Visa card. The packages were labeled "Thirsty Skull." A lab analysis confirmed the chemical presence of XLR-11 in the analyzed packages. XLR-11 was and is a federal controlled Schedule I substance.

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<sup>3</sup> According to the Oklahoma County Assessor's office, the listed owner is James Cheng Fang and Min-Hsing. James Cheng Fang is an accountant who participated in the set-up of the various Enterprise Corporations.

48. On August 21, 2014, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 1033 S. Meridian Ave, Oklahoma City, Oklahoma. The agent purchased three packages of synthetic cannabinoid and a pack of rolling papers for \$29.20. The package of synthetic cannabinoid was labeled "Thirsty Skull." A lab analysis confirmed the chemical presence of XLR-11 in the analyzed packages. XLR-11 was and is a Schedule I controlled substance.

49. On October 29, 2014, Sand Springs Police Department (SSPD) conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ shop located at 430 W. Wekiwa, Suite G, Sand Springs, Oklahoma. An SSPD officer purchased one bottle of synthetic cannabinoid labeled "Bizarro" for \$25.00. A lab analysis confirmed the chemical presence of AB-FUBINACA<sup>4</sup> in the analyzed bottle. AB-FUBINACA was at the time a Schedule I controlled substance. Upon entering the store, the officer spoke with a white male clerk. The officer asked the clerk if they had any "smoke able incense like Diablo or No More Mr. Nice Guy." The clerk said they no longer sell the packets of incense due to Tulsa County Sherriff's office serving a lot of search warrants lately. The officer asked the clerk if he knew where he could get some and the employee stated "No, pretty much everybody is laying low lately because of the police." The officer then asked if he knew when they were going to start selling it again and the clerk explained it was going to be a while, at least until the "heat" died down. The clerk said "I have something else for you if you like the incense stuff" and proceeded behind the counter and retrieved a box with multiple vials containing a light brown/tan liquid." The clerk said this stuff is

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<sup>4</sup> On February 10, 2014, AB-FUBINACA was officially listed federally as a Schedule I controlled substance.

the same as the other incense but in liquid form and designed to be placed into electronic cigarettes. The officer asked the clerk if he could use it on tobacco as well as something like a "Swisher Sweet" and smoke it like that. The clerk responded, "I'm sure you could, I've been selling a lot of it and people keep coming back for it." The officer asked if there was any difference between the different brands in the box or if they all had the same active ingredient. The clerk said he wasn't sure if they were the same but said he has a lot of repeat customers for the brands "Cloud 9" and "Bizarro." The officer said "Ok, I'm a superman fan so I'll take the "Bizarro" one." The clerk said "Ok, do you want an electronic cigarette to smoke it in, we sell them now too." The officer answered "No, I have one back home that I use." The officer completed the transaction and departed. It is clear from the conversation and sale that the store employee knew that liquid substance sold was intended for human consumption.

50. On November 1, 2014, the State of Oklahoma added several new chemical compounds to its list of Schedule I substances under 63 O.S. §2-204(F) including AB-FUBINACA; AB-PINACA; PB-22; AKB48 N-5-Fluoropentyl; AM1248; FUB-PB-22; ADB-FUBINACA; BB-22; 5-Fluoro PB-22; and 5-Fluoro AKB- 48. Additionally, the State added any cannabinoid compound which could be classified within any one of ten cannabinoid classes which would also result in their prohibition as Schedule I substances under 63 O.S. Section 2-204(G). This heightened enforcement and scrutiny was expected to have some impact on the substances sold by various ZIGGYZ stores in the Oklahoma City and Tulsa Metro areas. PB-22 was already a federally listed Schedule I controlled

substance and the others on the above list were substances determined to be controlled substance analogues for federal offense purposes.

51. On November 13, 2014, a DEA TFO conducted an undercover purchase at the ZIGGYZ located at 6560 East 41<sup>st</sup> Street, Tulsa, Oklahoma. The DEA TFO purchased two vials of a liquid product called "Bizarro." Lab analysis determined that the liquid contained AB-FUBINACA and XLR-11. AB-FUBINACA and XLR-11 are Schedule I controlled substances.

52. On November 13, 2014, a DEA TFO conducted an undercover purchase at the ZIGGYZ located at 5087 East 51<sup>st</sup> Street, Tulsa, Oklahoma. The DEA TFO purchased two vials of a liquid product called "Bizarro" and Green Blossoms." Lab analysis determined that the liquid contained AB-FUBINACA and AB-PINACA. AB-FUBINACA was and is a Schedule I controlled substance and AB-PINACA was and is a controlled substance analogue.

53. On December 11, 2014, OBN agents conducted undercover purchases at all five Oklahoma City ZIGGYZ retail locations and the Midwest City ZIGGYZ retail store. Agents purchased drug paraphernalia and packages of "Brain Freeze Automotive Air Freshener" with an average cost of \$10.00 per package. Each package varied in weight from 0.60 grams to 1.04 grams and labeled with flavors such as "Green Apple," "Tropical Blast" and "Orange Crush." During a purchase, the undercover agent was told he could tie the package to his rear view mirror as a way to avoid police detection. The products effects such as hallucinating and vomiting were also discussed. A lab analysis

confirmed the chemical presence of caffeine in the analyzed packages. Caffeine<sup>5</sup> is not a controlled substance or a controlled substance analogue. Affiant believes this type of substance being sold from the Oklahoma City stores appeared to be the direct consequence of the November 1st change to state law and heightened focus on synthetic cannabinoids by both state and federal law enforcement.

54. On March 2, 2015, an OBN agent conducted an undercover purchase of synthetic cannabinoids from the ZIGGYZ located at 4005 N. Pennsylvania Ave, Oklahoma City, Oklahoma. The agent purchased one package of synthetic cannabinoids and a pack of rolling papers for \$16.84. When the agent approached the female clerk he asked if she had any aroma. The clerk corrected the agent and said "it is air freshener now, but yeah." During the conversation, the agent discussed how the products he purchased last time made him feel. The clerk presented the agent with a package labeled "Mad Mayan Air Freshener." The clerk stated because it (Mad Mayan) was new, there were no deals or specials. The agent asked the clerk if the old style of aroma was coming back. The clerk said it would eventually come back but didn't know when. An Asian female identified as Wendy REN, sitting at her desk turned toward the clerk and the agent and said they were sending some people out of town to bring back some stuff. A lab analysis of the "Mad Mayan" product confirmed the chemical presence of N, N-diallyl-5-methoxytryptamine. N, N-diallyl-5-methoxytryptamine is a state of Oklahoma Scheduled controlled substance and federally is a controlled substance analogue in that it is chemically substantially

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<sup>5</sup> Pure powdered caffeine (Methyltheobromine) is a powerful stimulant in which very small ingested amounts may cause accidental overdose. Symptoms of caffeine overdose can include rapid or dangerously erratic heartbeat, vomiting, disorientation, seizures and death. Based on at least two deaths of young men in 2014, the Food and Drug Administration (FDA) issued a warning to consumers to avoid powdered pure caffeine.



similar to a Schedule I controlled substance and has a substantially similar impact on the central nervous system. "Mad Mayan Air Freshener" was for sale in all six of the Oklahoma City Metro stores.

55. On March 12, 2015, DEA, OBN, and IRS agents executed multiple search warrants for business entities and residences in the Oklahoma City and Lawton metro areas. John David Kitzmiller was among those detained and interviewed by law enforcement on that day. Kitzmiller told agents he delivered to Drew's Tobacco World, Mr. Coolz, and ZIGGYZ in the Oklahoma City area and to Chief's Icehouse in the Lawton area. KITZMILLER stated ZIGGYZ was run by an Asian guy named "Johnny" (Your affiant knows that Xiang Yu Ren, a Chinese national, goes by the name "Johnny"). KITZMILLER stated Mr. Coolz, Drew's Tobacco World, and ZIGGYZ had pretty much the same setup as far as delivery. KITZMILLER stated the only exception was he usually delivered ZIGGYZ products to the warehouse. KITZMILLER stated he did deliver to the ZIGGYZ store at 4005 N. Pennsylvania. KITZMILLER stated the deliveries of the packages of synthetic marijuana were usually in boxes. KITZMILLER stated he remembered going to the warehouse (ZIGGYZ) during a visit by Chuck Wolfe. KITZMILLER stated he thought the warehouse was primarily converted from housing glassware to vapor products, but was not aware of what was in all the boxes in the warehouse. KITZMILLER stated he understood the warehouse received bulk shipments and sold to retail outlets. KITZMILLER again stated he recalled delivering 10-12 boxes of glassware to the warehouse on one occasion. An older white male that worked at the warehouse counted all of the items. KITZMILLER stated that "Johnny" was the owner



of ZIGGYZ and described “Johnny” as a short stocky Chinese man. KITZMILLER stated he recalled “Johnny” had a sister, “Wendy” that also worked at the stores (Your Affiant knows that Wei Yu Ren is “Johnny’s sister” and she goes by the name “Wendy”). KITZMILLER stated he remembered hearing the name “Alisha” and thought she worked for “Johnny” and that she had taken some role in the glass and vapor dealings. KITZMILLER stated he remembered talking to “Alisha” on the phone to find a delivery spot. KITZMILLER stated he recalled delivering packets of spice and vapor items in addition to the glassware to the warehouse. KITZMILLER said he delivered product from Missouri to the ZIGGYZ warehouse from 2011 until Chuck Wolf’s arrest in 2014.

56. On June 21, 2012, Xiang Yu Ren purchased a warehouse located at 8201 Glade Avenue, Oklahoma City, Ok 73132, known as the ZIGGYZ warehouse. REN purchased this property using the name RenRen Irrevocable Trust Dated May 7, 2012 using funds from corporate accounts known to be the controlling entities of ZIGGYZ GIFT & NOVELTY SHOPS. These funds were used as earnest money and for closing funds in the purchase of 8201 Glade Avenue. REN was the primary signatory on these accounts. REN used funds from the following accounts:

- A. Check Number 1065 dated 04/23/2012 in the amount of \$10,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
- B. Check Number 1105 dated 04/26/2012 in the amount of \$10,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global

Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).

- C. Check Number 1075 dated 04/27/2012 in the amount of \$10,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
- D. Check Number 1076 dated 04/27/2012 in the amount of \$10,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
- E. Check Number 1078 dated 04/27/2012 in the amount of \$10,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
- F. Check Number 1108 dated 04/28/2012 in the amount of \$10,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).
- G. Check Number 1109 dated 04/27/2012 in the amount of \$10,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).

- H. Check Number 1110 dated 04/27/2012 in the amount of \$10,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).
  - I. Check Number 1109 dated 05/18/2012 in the amount of \$10,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
  - J. Check Number 1140 dated 05/18/2012 in the amount of \$10,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).
  - K. Check Number 1145 dated 05/23/2012 in the amount of 9,000.00 drawn on UMB Bank account number 9871823911 in the name Blue Moon Global Enterprises, Inc at 2016 N. MacArthur Blvd, Oklahoma City, OK 73127 (the address of a ZIGGYZ store).
  - L. Check Number 1132 dated 05/28/2012 in the amount of 9,000.00 drawn on Bank of Oklahoma account number 308425628 in the name Sunrise Enterprise, Inc at 4005 N. Pennsylvania Avenue, Oklahoma City, OK 73112 (the address of a ZIGGYZ store).
57. These payments total \$118,000.00 REN extracted from the ZIGGYZ store location profits in order to purchase the warehouse at 8201 Glade Avenue, Oklahoma City,

Oklahoma. Furthermore, REN obtained financing via a mortgage from Quail Creek Bank, NA (Loan Number 185711 in the amount of \$278,029.02 on June 21, 2012 in order to purchase the warehouse at 8201 Glade Avenue. REN used funds from ZIGGYZ enterprise bank accounts to make payments on this mortgage. From April 04, 2013 through September 10, 2014, REN paid \$38,373.20 from ZIGGYZ enterprise accounts into the mortgage on 8201 Glade Avenue.

58. In total, REN has conducted financial transactions in excess of \$156,000.00 involving proceeds from the sale of synthetic cannabinoid and/or drug paraphernalia in order to purchase the warehouse at 8201 Glade Avenue, Oklahoma City, Oklahoma.

59. On April 22, 2015, federal search and seizure warrants were issued for (4) residential properties related to ZIGGYZ, (12) retail ZIGGYZ stores and one ZIGGYZ warehouse located at 8201 Glade Avenue, Oklahoma City, OK. Agents seized approximately 11,494.1 grams of suspected synthetic cannabinoids and approximately **1,241 boxes of miscellaneous drug paraphernalia from the Glade warehouse.** This warehouse was used to receive product from sources of supply until the product is distributed to the various stores in the Oklahoma and Tulsa metro areas. The warehouse is owned by Xiang Yu Ren Trust/Ren Ren, Irrevocable Trust with "Johnny" Ren as trustee.

60. On May 14, 2015, Investigators interviewed former ZIGGYZ employee, Paul GILBERT. When asked about locations in which synthetics; aka: K2 have been stored, GILBERT advised on November 1, 2014, he observed a large amount of K2 in the attic at the home of Wendy REN, 10405 Bishops Gate in Oklahoma City. GILBERT stated on that

date, he personally removed enough white trash bags filled with K2 from the attic to fill the bed of his pickup truck. GILBERT said REN had stolen the K2 from the stores and secreted it in her attic.

61. On April 22, 2015, Investigators executed a federal search and seizure warrant on the residence of Johnny REN located at 14712 Hollyhock Drive, Oklahoma City, Oklahoma. Located inside the garage was an Audi SUV which contained a package suspected to be synthetic cannabinoids marked "Krazy Kratom". Located in the master bedroom closet were two safes in which Investigators seized an estimated **\$362,850.45 in gold, silver and collector coins**, \$23,700.00 in U.S. currency, along with foreign currency, jewelry and a safe deposit box key inside an envelope marked "Nevada State Bank; 10x10, 7101.5". A subsequent search of the Nevada State Bank safe deposit box resulted in the seizure of **\$488,860.00 in U.S. currency**.

62. On or about May 29, 2014, using Almond Tree Irrevocable Trust, Johnny REN purchased 14712 Hollyhock Drive, Oklahoma City, Oklahoma, located in the Gaillardia subdivision for \$550,000.00. During the search of REN's home Investigators attempted to interview Johnny REN about his businesses and income at which time REN declined. A source of legitimate income during the time of purchase for 14712 Hollyhock Drive, Oklahoma City, Oklahoma has not been identified.

63. On or about July 11, 2013, Almond Tree Irrevocable Trust, 8201 Glade Avenue, Oklahoma City, OK, also purchased 1410 NW 41<sup>st</sup> Street, Oklahoma City, Oklahoma for \$61,600.00.

64. On or about October 26, 2012, RENREN Irrevocable Trust with an address of "4005 N Penn, Oklahoma City, OK 73112", purchased 1318 N. Drexel Blvd, Oklahoma City, Oklahoma for \$50,000.00. The filing documents for this property listed a bill to address of "RENREN Irrevocable Trust dated May 7, 2012, 8201 Glade, OKC, OK 73132". On April 22, 2015, pursuant to a search warrant, Investigators seized documents pertaining to synthetic cannabinoids and drug paraphernalia from 1318 N. Drexel Blvd, Oklahoma City, Oklahoma.
65. On or about January 4, 2013, using Rendaren Irrevocable Trust with an address of "4005 N Penn, Oklahoma City, OK 73112", REN purchased a condominium located at 4391 Alexis Drive, Unit 317, Las Vegas, Nevada for \$66,045.80.
66. On or about April 26, 2013, using the Rendaren Irrevocable Trust with an address of "8201 N. Glade Avenue, Oklahoma City, OK 73132", REN purchased a home located at 6238 Mustang Spring Ave, Las Vegas, Nevada for \$417,686.00.
67. Based on seized tax documents from previous years, Johnny REN's gross income did not exceed \$30,000.00 per year.

#### **PROPERTY DESCRIPTION**

68. This affidavit is submitted in support of the civil complaint of forfeiture by the United States against the property listed below which has been identified as property of Xiang Yu Ren; aka: Johnny Ren and/or Wei Yu Ren, aka: Wendy Ren.

(1,241) Boxes of assorted drug paraphernalia

(82) Boxes of assorted drug paraphernalia

(25) Boxes of assorted drug paraphernalia


(34) Boxes of assorted drug paraphernalia  
(40) Boxes of assorted drug paraphernalia  
(30) Boxes of assorted drug paraphernalia  
(55) Boxes of assorted drug paraphernalia  
(22) Boxes of assorted drug paraphernalia  
(16) Boxes of assorted drug paraphernalia  
(12) Boxes of assorted drug paraphernalia  
(15) Boxes of assorted drug paraphernalia  
(23) Boxes of assorted drug paraphernalia  
2011 Jeep Wrangler Unlimited Sport  
2012 Toyota FJ Cruiser SUV  
\$488,860.00 in U.S. Currency  
\$18,163.00 in U.S. Currency  
\$3,404.00 in U.S. Currency  
\$2459.73 in assorted foreign currency  
\$362,850.45 in assorted gold and silver bars and collectible coins  
\$55,439.38 in assorted jewelry

### **CONCLUSION**

Based on the foregoing facts and circumstances, I believe that probable cause exists to show that the property listed above was used to facilitate Xiang Yu Ren and Wei Yu Ren criminal activity and was purchased with proceeds of criminal activity as Wei Yu

Ren and Xiang Yu Ren had no other known source of legitimate income during the time of purchase.

Further your affiant sayeth not.

  
\_\_\_\_\_  
Gary D. Lawson, Investigator  
Drug Enforcement Administration

Subscribed and sworn before me this 24<sup>th</sup> day of September 2015.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

2/8/18

